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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 CISCO SYSTEMS, INC.,

18 Plaintiff,

19 v.

20 ARISTA NETWORKS, INC.,

21 Defendant.
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Case No. 5:14-cv-05344-BLF (NC)

**DECLARATION OF RYAN K. WONG
IN SUPPORT OF PLAINTIFF CISCO
SYSTEMS, INC.'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
CONFIDENTIAL INFORMATION IN
CISCO'S TRIAL BRIEF RE: ANALYTIC
DISSECTION AND FILTRATION
(ECF 616)**

Judge: Hon. Beth Labson Freeman

Date Filed: December 5, 2014

Trial Date: November 21, 2016

1 I, RYAN K. WONG, declare:

2 1. I am an attorney licensed to practice law in the State of California and am an
3 associate with the law firm of Keker & Van Nest LLP, located at 633 Battery Street,
4 San Francisco, California 94111, counsel for Defendant Arista Networks, Inc. (“Arista”) in the
5 above-referenced action. Unless otherwise stated, the facts I set forth in this declaration are based
6 on my personal knowledge or knowledge I obtained through my review of corporate records or
7 other investigation. If called to testify as a witness, I could and would testify competently to such
8 facts under oath.

9 2. I submit this declaration in support of the Administrative Motion to File Under
10 Seal Confidential Information in Cisco’s Trial Brief Re: Analytic Dissection and Filtration filed
11 by Plaintiff Cisco Systems, Inc. (“Cisco”) on November 8, 2016 (ECF 616). I have reviewed
12 Cisco’s Motion to Seal and the Civil Local Rules of this Court governing such motions, and
13 submit this supporting declaration under Civil L.R. 79-5(e).

14 3. Cisco’s Motion to Seal seeks to file under seal documents and information
15 submitted in connection with its trial brief on analytic dissection and filtration, which is a non-
16 dispositive brief. Because Cisco’s Motion to Seal relates to non-dispositive briefing, the
17 documents and information that the parties request to file under seal are *not* subject to a strong
18 presumption of public access. *See Kamakana v. City & County of Honolulu*, 447 F.3d 1172, 1180
19 (9th Cir. 2006). Rather, the “good cause” standard of Rule 26(c) of the Federal Rules of Civil
20 Procedure applies to the material that Cisco’s Motion to Seal seeks to withhold from public view.
21 *Id.* at 1179. Civil Local Rule 79-5 further requires that a party seeking to seal information and
22 documents “establish[] that the document, or portions thereof, are privileged, protectable as a
23 trade secret or otherwise entitled to protection under the law.” Civil L.R. 79-5(b). The sealing
24 request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.* I submit
25 this declaration to provide additional facts in support of Cisco’s Motion to Seal, and to provide
26 facts establishing that the “good cause” standard has been met for materials that Arista seeks to
27 file under seal.

4. For purposes of a motion to seal, I understand that a “trade secret” is “any formula, pattern, device or compilation of information which is used in one’s business, and which gives him an opportunity to obtain an advantage over competitors who do not know or use it.” *See In re Elec. Arts, Inc.*, 298 F. App’x 568, 569–70 (9th Cir. 2008) (nonprecedential) (quoting Restatement (First) of Torts § 757 cmt. b (1939)) (applying the Restatement’s definition of trade secret in the record-sealing context); *Clark v. Bunker*, 453 F.2d 1006, 1009 (9th Cir. 1972) (adopting the Restatement’s definition of trade secret).

5. I further understand that good cause—indeed, compelling reasons—may exist to file materials under seal when, for example, court filings could be used for improper purposes, such as “to gratify private spite, promote public scandal, circulate libelous statements, or release trade secrets.” *Kamakana*, 447 F.3d at 1178–79 (citation omitted). I further understand that good cause and compelling reasons may exist where court filings contain or discuss confidential source code, *see Apple, Inc. v. Samsung Electronics Co., Ltd.*, No. 11-cv-1846, D.I. 2190 at *3 (Dec. 10, 2012); internal and non-public procedures of financial institutions, *see Cowan v. GE Capital Retail Bank*, No. 13-cv-03935-BLF, 2015 WL 1324848, at *1-3 (N.D. Cal. Mar. 24, 2015); information about an entity’s confidential “business performance, structure, and finances that could be used to gain unfair business advantage against them,” *Schwartz v. Cook*, No. 15-cv-03347-BLF, 2016 WL 1301186, at *2 (N.D. Cal. Apr. 4, 2016); “highly sensitive information regarding [an entity’s confidential] product architecture and development,” *Delphix Corp. v. Actifio, Inc.*, No. 13-cv-04613-BLF, 2014 WL 4145520, at *2 (N.D. Cal. Aug. 20, 2014); emails containing confidential information about an entity’s “business practices, recruitment efforts, and discussions regarding potential partnerships with other product manufacturers,” *see Koninklijke Philips N.V. v. Elec-Tech International Co., Ltd.*, No. 14-cv-02737-BLF, 2015 WL 581574, at *1–2 (N.D. Cal. Dec. 10, 2015); and “information regarding non-public recruitment efforts and business practices” of a party. *See id.* at *2-3.

6. Cisco submitted a declaration in support of its Motion to Seal (ECF 616-1) that identified and attached highlighted copies of material that should be sealed. To the extent that those exhibits implicate Arista materials, I address those exhibits below in the order that they are

1 listed in Cisco's Motion. Per the instructions provided on the Northern District of California's
 2 website, this declaration is drafted so that it does not reveal confidential information, and
 3 therefore does not need to be filed under seal. *See* <http://www.cand.uscourts.gov/ecf/underseal>.

4 7. Cisco's Trial Brief Re: Analytic Dissection (ECF 616-23): Arista disputes Cisco's
 5 characterization of its discovery responses and the underlying evidence in the highlighted
 6 portions of this document, but Arista does *not* seek to file under seal any of the material
 7 highlighted in this document. Arista takes no position to the extent other parties or non-parties
 8 may seek to file under seal any of the material highlighted in this document.

9 8. Exhibit A to the Declaration of Kevin C. Almeroth in Support of Cisco's Trial
 10 Brief Re: Analytic Dissection (ECF 616-4): This document is a copy of Dr. Almeroth's Opening
 11 Expert Report. On August 24, 2016, the Court found compelling reasons to seal the highlighted
 12 portions of this document and granted Cisco's motion to seal the highlighted portions of this
 13 document in connection with the parties' summary judgment briefing. ECF 487 at 5–10 (the
 14 Court's August 24, 2016 Order). For the same reasons that the Court previously found
 15 compelling reasons to seal the highlighted material, there is good cause to seal the Arista
 16 confidential information in the highlighted portions of this document:

- 17 • Last two lines of page 29 and the first two lines of page 30 disclose the contents of
 18 an internal and confidential Arista design document that pertains to the
 19 development of its products. There are compelling reasons to seal highly sensitive
 20 information regarding Arista's product architecture and development. *See*
 21 *Delphix*, 2014 WL 4145520, at *2.
- 22 • The highlighted portions of Paragraph 78 on page 31 disclose the substance of, and
 23 quote directly from, confidential customer communications by Arista relating to
 24 product support and both product and documentation development. There are
 25 compelling reasons to seal highly sensitive information regarding Arista's product
 26 architecture and development, as well as its confidential business practices
 27 regarding customer support and documentation. *See Delphix*, 2014 WL 4145520,
 28 at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.

- 1 • The highlighted portions of Paragraph 79 on pages 31 and 32 disclose the
2 substance of, and quote directly from, confidential internal communications by
3 Arista relating to product support and documentation development. There are
4 compelling reasons to seal highly sensitive information about its confidential
5 business practices regarding customer support and documentation. *See*
6 *Koninklijke Philips*, 2015 WL 581574, at *1–2.
- 7 • A portion of the reproduced testimony from the deposition of Arista employee
8 Kenneth Duda on page 49 of this exhibit—specifically, the testimony from 150:24
9 through 151:8 of the cited deposition transcript—should be sealed because it
10 discusses confidential information regarding networking equipment used by
11 Arista’s customers. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*,
12 2015 WL 581574, at *1–2.
- 13 • The highlighted portions of Paragraph 118 on page 56 disclose internal and
14 confidential Arista communications regarding feature-specific product
15 development decisions and customer support communications relating to Arista
16 products. There are compelling reasons to seal highly sensitive information about
17 Arista’s product development decisions and confidential business practices
18 regarding customer support. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke*
19 *Philips*, 2015 WL 581574, at *1–2.
- 20 • Paragraphs 138 and 142, including the excerpted deposition transcripts and images
21 taken from highly confidential Arista documents that are a part of those
22 paragraphs, should be sealed in their entirety because they discuss and reveal
23 multiple details regarding Arista’s non-public, internal competitive testing and
24 analysis procedures underlying Arista’s product design and development. Such
25 competitive intelligence and product development information is meets the
26 compelling-reasons standard for sealing. *See Delphix*, 2014 WL 4145520, at *2;
27 *Koninklijke Philips*, 2015 WL 581574, at *1–2.

- 1 • The highlighted portions of Paragraphs 147 and 148, including each of the bullet
2 points on pages 71 through 77 (which are part of Paragraph 148), should be sealed
3 because they discuss the design and development of specific features of Arista's
4 products, and Arista maintains that information about its specific design decisions
5 as highly confidential. Paragraph 147 discusses testimony from Arista witnesses
6 regarding details about Arista's internal and confidential product development
7 process and strategies. Paragraph 148 and each of the bullet points within it are
8 specifically directed at internal Arista emails and presentations regarding product
9 architecture and development, and the bullet points discuss non-public
10 development strategies for specific aspects of the Arista product. There are
11 compelling reasons to seal sensitive feature-specific details regarding Arista's
12 internal product design and development process. *See Delphix*, 2014 WL
13 4145520, at *2.
- 14 • Footnote 102 should be sealed because it quotes testimony from an Arista engineer
15 regarding the design and development of a specifically identified feature of
16 Arista's products. Similarly, Footnote 118 should be sealed because it quotes
17 testimony from a highly confidential internal Arista communication that discusses
18 the design and development of a specifically identified feature of Arista's
19 products. Arista maintains such product-development information about its design
20 decisions as highly confidential. There are compelling reasons to seal sensitive
21 feature-specific details regarding Arista's internal product design and development
22 process. *See Delphix*, 2014 WL 4145520, at *2.
- 23 • Paragraphs 149 through 151, including the excerpted graphics in Paragraphs 150
24 and 151, should be sealed because they discuss the results of a highly confidential
25 product comparison analysis conducted by Arista. There are compelling reasons
26 to seal this information because these paragraphs (and the excerpted images)
27 reveal the detailed results of these internal tests, and Arista's competitive sales
28 strategies regarding those results. That information is highly confidential to Arista

as part of its product development and testing process, as well as its sales and marketing strategies. This is the type of sensitive technical product information and competitive intelligence that would cause competitive harm to Arista if disclosed publicly. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.

- Paragraph 152 and the excerpted images within it (which extend to the top of page 80) should be sealed because they reveal the results of a highly confidential competitive analysis performed by Arista regarding the preferences of its customers, and also discuss particular tracking documents that are part of Arista’s internal development and design process. That information is highly confidential to Arista, and is the type of sensitive product development information and competitive/customer intelligence that would cause competitive harm to Arista if disclosed publicly. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.
- The images shown in Paragraphs 170 and 171 should be sealed because they reveal confidential information about the development of certain accused features of Arista’s products (image in Paragraph 170, at the top of page 89), and about Arista’s source code (image in Paragraph 171, at the top of page 90). *See Delphix*, 2014 WL 4145520, at *2; *Apple*, No. 11-cv-1846, D.I. 2190 at *3.
- The excerpted deposition testimony of Adam Sweeney in Paragraph 195 and 196 (which extends from the bottom of page 103 to the top of page 104) should be sealed because it discusses the non-public details of a particular technical support request for an Arista product, and Arista’s internal process for resolving the request. Such details regarding the internal business processes for responding to specific technical support requests should remain under seal. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.
- The highlighted portion of Paragraph 203 should be sealed because it discusses highly confidential information and cites from an internal, non-public Arista

document regarding the development of a particular aspect of the Arista product. Such sensitive details regarding the development of Arista's products should remain under seal. *See Delphix*, 2014 WL 4145520, at *2.

- The highlighted portions of Paragraphs 219 and 220, and the excerpted images within Paragraph 219 (which extend from pages 113 to 115) should be sealed because they reveal (and excerpt) highly confidential sales materials created by Arista for a non-public presentation to a particular prospective customer, and therefore reveal Arista's internal competitive sales strategies. This information is highly confidential to Arista, and is the type of sensitive competitive materials that would cause competitive harm to Arista if disclosed publicly. *See Koninklijke Philips*, 2015 WL 581574, at *1–2.
- The following portions of Paragraph 237 should be sealed: (1) The excerpted deposition testimony of Arista employee Kenneth Duda from page 145, line 14 to page 146, line 20 of the transcript excerpt. That portion of the excerpted Duda deposition transcript discusses Arista's internal customer intelligence regarding customer preferences in particular market segments, and the benefits of certain development approaches taken by Arista vis-à-vis that intelligence. (2) The entire excerpted deposition testimony of Arista employee Anshul Sadana. The excerpted Sadana deposition transcript discusses Arista's internal customer intelligence regarding customer preferences, and the benefits of certain development approaches taken by Arista vis-à-vis that intelligence. Those portions of Paragraph 237 should be sealed. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.
- The following portions of Paragraph 238 should be sealed: The excerpted deposition testimony of Arista employee Kenneth Duda from page 176, line 14 to page 177, line 8 of the transcript should be sealed because it discusses confidential information regarding networking equipment used by Arista's customers. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.

- 1 • The bullet points in Paragraph 240 should be sealed because they quote from
- 2 highly confidential internal Arista development documents that discuss the
- 3 strategic decisions underlying the development and architecture of Arista products.
- 4 Such sensitive information should remain under seal. *See Delphix*, 2014 WL
- 5 4145520, at *2.
- 6 • Paragraph 241 should be sealed because it reveals internal and highly sensitive
- 7 customer intelligence about the usage of particular features in Arista’s products by
- 8 its customers, which could be used by competitors for purposes of developing
- 9 features on their own products. *See Koninklijke Philips*, 2015 WL 581574, at *1–
- 10 2.
- 11 • The sentence in Paragraph 250 that starts with “For example,” should be sealed
- 12 because it quotes from highly confidential internal Arista development document
- 13 discussing the strategic decisions underlying the development and architecture of
- 14 Arista products. Such sensitive information should remain under seal. *See*
- 15 *Delphix*, 2014 WL 4145520, at *2.

16 9. Exhibit C to the Declaration of Kevin C. Almeroth in Support of Cisco’s Trial
 17 Brief Re: Analytic Dissection (ECF 616-5): Arista seeks to file under seal the highlighted
 18 portions (the second to last column of the table outlined in red) of this document. There is good
 19 cause to seal those portions of the document because they reveal internal, non-public information
 20 regarding Arista’s source code and the development timeline of features within Arista’s products.
 21 Feature-specific details regarding Arista’s internal product design and development process and
 22 timeline should remain under seal. *See Delphix*, 2014 WL 4145520, at *2.

23 10. Exhibit F to the Declaration of Kevin C. Almeroth in Support of Cisco’s Trial
 24 Brief Re: Analytic Dissection (ECF 616-7): Arista seeks to file under seal the highlighted
 25 portions (the last column of the table outlined in red) of this document. There is good cause to
 26 seal those portions of the document because they reveal internal, non-public information
 27 regarding Arista’s source code and the development timeline of features within Arista’s products.

1 Feature-specific details regarding Arista's internal product design and development process and
 2 timeline should remain under seal. *See Delphix*, 2014 WL 4145520, at *2.

3 11. Exhibit G to the Declaration of Kevin C. Almeroth in Support of Cisco's Trial
 4 Brief Re: Analytic Dissection (ECF 616-9): Line-specific and file-specific details about Arista's
 5 product source code are discussed throughout this two-hundred page document, and such
 6 information is interspersed with similarly detailed information about Cisco's source code. Arista
 7 maintains much of its product source code as highly confidential and non-public, and it would
 8 cause harm to Arista if information about its confidential product source code is made public.
 9 There is good cause to seal confidential source code information in non-dispositive court filings.
 10 *See Delphix*, 2014 WL 4145520, at *2; *Apple*, No. 11-cv-1846, D.I. 2190 at *3. Arista takes no
 11 position on whether Cisco's source code information should be sealed, but notes that Arista's
 12 source code information is intertwined with the Cisco source code discussed in this document,
 13 and therefore requests sealing the document in its entirety.

14 12. Exhibit H to the Declaration of Kevin C. Almeroth in Support of Cisco's Trial
 15 Brief Re: Analytic Dissection (ECF 616-11): This document is a copy of Dr. Almeroth's
 16 Rebuttal Expert Report. On August 24, 2016, the Court found compelling reasons to seal the
 17 highlighted portions of this document and granted Cisco's motion to seal the highlighted portions
 18 of this document in connection with the parties' summary judgment briefing. ECF 487 at 10–13
 19 (the Court's August 24, 2016 Order). For the same reasons that the Court previously found
 20 compelling reasons to seal the highlighted material, there is good cause to seal the Arista
 21 confidential information in the highlighted portions of this document:

- 22 • Footnote 106 on Page 60, which reproduces testimony from the Rule 30(b)(6)
 23 deposition of Arista employee Anshul Sadana, should be sealed because it reveals
 24 non-public and highly confidential information about the impact of specific
 25 features in Arista's products on Arista's sales cycles. There are compelling
 26 reasons to seal this information as it relates both to internal product development
 27 as well as sensitive competitive information regarding customer preferences, what
 28

product features may or may not impact sales. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.

- The highlighted text in Paragraph 138, sub-sections (a), (c), (d), (e), (g), (h), (i), (j) are excerpts from highly confidential internal Arista documents and communications that discuss internal design and development decisions and strategic reasons regarding specific aspects of Arista’s products. Given the sensitivity of Arista’s confidential product design and development decision-making processes, those portions of Paragraph 138 should be sealed. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.
- The quoted text pulls in Paragraph 143 are excerpts from highly confidential internal Arista documents and communications that discuss internal design and development decisions and strategic reasons regarding specific aspects of Arista’s products. Given the sensitivity of Arista’s confidential product design and development decision-making processes, those portions of Paragraph 143 should be sealed. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.
- Paragraph 144, including the excerpted image, should be sealed in its entirety because it discusses the results of a highly confidential product comparison analysis conducted by Arista. There are compelling reasons to seal this information because these paragraphs (and the excerpted image) reveal the detailed results of these internal tests, and Arista’s competitive sales strategies and conclusions regarding those results. That information is highly confidential to Arista as part of its product development and testing process, as well as its sales and marketing strategies. This is the type of sensitive technical product information and competitive intelligence that would cause competitive harm to Arista if disclosed publicly. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.
- The quoted text pull in Paragraph 146 is an excerpt from a highly confidential internal Arista document that discusses internal design and development decisions and

1 strategic reasons regarding specific aspects of Arista's products. Given the sensitivity
 2 of Arista's confidential product design and development decision-making processes,
 3 that portion of Paragraph 146 should be sealed. *See Delphix*, 2014 WL 4145520, at
 4 *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2.

- 5 • In Paragraph 147, the second sentence (starting with “In 2010 ...”) through to the
 6 sentence that starts with “Arista's CEO ...” should be sealed because they discuss and
 7 excerpt material from internal Arista communications that reveal Arista's strategic
 8 decision-making regarding customer preferences/complaints and the development of
 9 user documentation. Given the sensitivity of this internal information about Arista's
 10 customers and its documentation strategies, those portions of Paragraph 147 should be
 11 sealed. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574,
 12 at *1–2.
- 13 • The bullet points in Paragraph 149 should be sealed because they quote directly from
 14 internal Arista documents and communications that reveal customer intelligence
 15 regarding customer preferences, the benefits that customers receive from particular
 16 aspects of Arista's products, and Arista's sales and marketing strategies with respect
 17 to those preferences and benefits. This type of internal strategic competitive
 18 information should be sealed. *See Delphix*, 2014 WL 4145520, at *2; *Koninklijke*
 19 *Philips*, 2015 WL 581574, at *1–2.
- 20 • Paragraph 154 and footnote 168 should be sealed in their entirety because they reveal
 21 highly confidential information regarding the development and features of future
 22 releases of Arista's products. There are compelling reasons to seal sensitive
 23 information about unreleased Arista products. *See Delphix*, 2014 WL 4145520, at *2.
- 24 • Paragraph 160 should be sealed in its entirety because it discusses the same highly
 25 confidential comparative study between Arista's products and competing products that
 26 is discussed in Paragraph 144 of this same exhibit (which Arista also seeks to seal),
 27 and Arista's conclusions and strategic use of that internal research. It also discloses
 28 Arista's sensitive competitive sales strategies with respect to communications to

prospective customers regarding product differentiation. There are compelling reasons to seal this type of competitive intelligence, including Arista's business strategies. *See Koninklijke Philips*, 2015 WL 581574, at *1–2.

13. Exhibit 4 to the Declaration of Drew Holmes in Support of Cisco's Trial Brief Re: Analytic Dissection (ECF 616-17): Arista does *not* seek to file under seal any of the material highlighted in this document. Arista takes no position to the extent other parties or non-parties may seek to file under seal any of the material highlighted in this document.

14. Exhibit 11 to the Declaration of Drew Holmes in Support of Cisco's Trial Brief Re: Analytic Dissection (ECF 616-18): This exhibit consists of excerpts from the January 29, 2016 deposition transcript of Arista employee Adam Sweeney. There is good cause to seal the following portions of this deposition transcript:

- Pages 174:3–175:3
- Page 176:7–25
- Pages 216:1–219:25

The foregoing portions of Mr. Sweeney's deposition transcript should be sealed because they discuss and disclose internal, non-public information regarding competitive intelligence, Arista sales strategies, and Arista's interactions with customers, and also reveal details regarding Arista's internal, highly confidential product development and design process. There is good cause to seal this type of sensitive, internal information about product sales and development. *See In re Elec. Arts, Inc.*, 298 F. App'x at 569–70; *Delphix*, 2014 WL 4145520, at *2; *Koninklijke Philips*, 2015 WL 581574, at *1–2; *see also Schwartz*, 2016 WL 1301186, at *2 (discussing the harm that could result by the dissemination of similar sensitive internal business information to competitors, who would find it valuable).

15. Exhibit 16 to the Declaration of Drew Holmes in Support of Cisco's Trial Brief Re: Analytic Dissection (ECF 616-20): This exhibit consists of Arista's supplemental discovery responses to Cisco's Interrogatory No. 9. There is good cause to seal the following portions of this document:

- The table starting on Page 8, line 13, and ending on Page 9, line 28

- The table starting on Page 10, line 6, and ending on Page 12, line 3
- The table starting on Page 12, line 13, and ending on Page 16, line 11
- The table starting on Page 16, line 20, and ending on Page 23, line 15
- The information on Page 23, lines 16 through 27

The foregoing portions of this document contain details of Arista's internal product design and development efforts that are non-public and highly confidential. There is good cause to keep such product design and development information under seal. *See Delphix*, 2014 WL 4145520, at *2; *Apple*, No. 11-cv-1846, D.I. 2190 at *3.

16. Exhibit 17 to the Declaration of Drew Holmes in Support of Cisco's Trial Brief Re: Analytic Dissection (ECF 616-21): This exhibit consists of Arista's supplemental discovery responses to Cisco's Interrogatory No. 26. There is good cause to seal the following portions of this document:

- The table starting on Page 7, line 11, and ending on Page 18, line 13

The foregoing portions of this document contain details of Arista's internal product design and development efforts with respect to its product source code that are non-public and highly confidential. There is good cause to keep such product design and development information under seal. *See Delphix*, 2014 WL 4145520, at *2; *Apple*, No. 11-cv-1846, D.I. 2190 at *3.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on November 14, 2016, in San Francisco, California.



RYAN K. WONG